

Judge Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	NO. CR15-391RAJ
)	
Plaintiff,)	
)	DEFENDANT'S RESPONSE TO
vs.)	GOVERNMENT'S MOTION FOR
)	PROTECTIVE ORDER
SCHULYER P. BARBEAU)	
)	Noted: January 8, 2015
Defendant.)	

The defendant, Schulyer Barbeau, through counsel, submits this response to the Government's Motion for a Protective Order.

Initially, Mr. Barbeau wants to emphasize that he has nothing to do with the actions of his supposed "supporters" who have posted information about the confidential source and the agents working on the case. Indeed, Mr. Barbeau had no contact with friends and family from the time of his arrest until people started posting information about his case on the internet. He has not directed anyone to take action related to the confidential source and the agents. If he were able, he would discourage people from committing the acts outlined in the Government's memo. Mr. Barbeau recognizes that the acts by some people who claim to "support" him are, in fact, a hindrance to his defense and only cast him in a negative light.

The defense has no objection to Government's proposed protective order. However, the defense requests that the Government be required to provide the defense

1 with a version of the discovery in which the names of the confidential source and case
2 agents is redacted, so that the redacted discovery can be provided to Mr. Barbeau. If the
3 Government is able to articulate concerns regarding Mr. Barbeau's access to paper
4 copies of the redacted discovery, then he should at least be allowed access to the
5 redacted discovery in an electronic format at the Federal Detention Center where he
6 would be unable to print or send it to anyone else.

7 DATED this 31st day of December, 2015.

8 Respectfully submitted,

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10 s/ Dennis Carroll

11 Dennis Carroll
12 Assistant Federal Public Defender
13 Attorney for Schuler Barbeau
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CERTIFICATE OF SERVICE

I hereby certify that on the date below, I filed the foregoing Defendant's Response to Government's Motion for Protective Order with the Clerk of the Court using the CM/ECF system, which will send notification of filing to all parties of record.

DATED this 31st day of December, 2015.

s/ Kathleen Gilkey
Kathleen Gilkey, Paralegal